

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

DON GIBSON, LAUREN CRISS, JOHN  
MEINERS, and DANIEL UMPA, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF  
REALTORS; *et al.*,

Defendants.

Case No.: 4:23-cv-00788-SRB

[Consolidated with 4:23-cv-00945-SRB]

**PLAINTIFFS' CONSENTED MOTION FOR EXTENSION OF TIME**

Plaintiffs respectfully request that the Court enter an order extending until February 7, 2025, the time for Plaintiffs to respond to Defendants Berkshire Hathaway Energy and William Raveis's Motions to Compel, filed on January 17, 2025 (the "Motions"). Plaintiffs further request that the Court permit Plaintiffs to submit one consolidated opposition to the two motions, not to exceed twenty-five pages. Finally, Plaintiffs further request that the Court extend the time for Berkshire Hathaway Energy and William Raveis to file any replies in support of their motions until February 28, 2025. In support of this Motion, Plaintiffs state:

1. The Motions both move to compel arbitration and, in the alternative, to stay the claims against each defendant. Given the similarity in the issues raised in the two Motions, Plaintiffs believe it will be most efficient to address them in a single opposition. Plaintiffs seek a one-week extension of the time to respond to accommodate counsel's previously scheduled vacation during the current deadline.

2. Counsel for Plaintiffs conferred with counsel for Berkshire Hathaway Energy and William Raveis, who consent to Plaintiffs' request for an extension to February 7, 2025. Counsel for Berkshire Hathaway Energy and William Raveis requested that the time period for their Reply briefs be extended to February 28, 2025. Plaintiffs do not oppose that request.

3. This Motion is not filed for the purpose of delay or harassment, and will not cause prejudice as all Parties have consented to the timeframe for the extension.

WHEREFORE Plaintiffs respectfully request that this Court enter an Order granting Plaintiffs an extension of time up to and including February 7, 2025, to respond to Berkshire Hathaway Energy and William Raveis's motions (ECF Nos. 634, 636); granting Plaintiffs leave to file a single consolidated opposition, not to exceed twenty-five pages; and extending the time for Berkshire Hathaway Energy and William Raveis to file any replies in support of their motions until February 28, 2025.

DATED: January 22, 2025

Respectfully submitted,

By: /s/ Beatrice C. Franklin

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of January 2025, a copy of the foregoing document was filed with the court's electronic filing system which sent notification of such filing to all counsel of record.

/s/ Beatrice C. Franklin  
Beatrice C. Franklin